

<b>FILING FEE</b>	
PAID	\$ 250.00
Pro hac	299853
Vice	299853
Angela E. Noble, Clerk	

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**CASE NO.: 23-cr-80101-AMC**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD J. TRUMP,  
WALTINE NAUTA, and  
CARLOS DE OLIVEIRA,

Defendants.

FILED BY <u>MC</u> D.C.
MAR 13 2025
ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - MIAMI

**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Loree Stark of American Oversight, 1030 15th Street, NW, B255, Washington, D.C. 20005, Telephone 202-869-5246, for purposes of appearance as co-counsel on behalf of non-party American Oversight in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Loree Stark to receive electronic filings in this case, and in support thereof states as follows:

1. Loree Stark is not admitted to practice in the Southern District of Florida. She is a member in good standing of State Bar of Kentucky; State Bar of District of Columbia; State Bar of West Virginia; and the U.S. District Court for the Eastern District of Kentucky; U.S. Tax Court; U.S. District Court for the Southern District of West Virginia; U.S. District Court for the Northern District of West Virginia; and U.S. Court of Appeals for the Fourth Circuit.

2. Movant, Barbara R. Llanes, Esquire, of the law firm of Gelber Schachter & Greenberg, P.A., One Southeast Third Avenue, Suite 2600, Miami, Florida 33131, Telephone 305-728-0950, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Loree Stark has made payment of this Court's \$250 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Loree Stark, by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Loree Stark at email address: [loree.stark@americanoversight.org](mailto:loree.stark@americanoversight.org).

WHEREFORE, Barbara R. Llanes, moves this Court to enter an Order permitting Loree Stark to appear before this Court on behalf of non-party American Oversight for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Loree Stark.

Dated: March 13, 2025

Respectfully Submitted,

/s/ Barbara R. Llanes

ADAM M. SCHACHTER

Florida Bar No. 647101

[aschachter@gsgpa.com](mailto:aschachter@gsgpa.com)

BARBARA R. LLANES

Florida Bar No. 1032727

[bllanes@gsgpa.com](mailto:bllanes@gsgpa.com)

GELBER SCHACHTER & GREENBERG, P.A.

One Southeast Third Avenue, Suite 2600

Miami, Florida 33131

Telephone: (305) 728-0950

E-service: [efilings@gsgpa.com](mailto:efilings@gsgpa.com)

*Counsel for non-party American Oversight*